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July 6, 2007

VIA FACSIMILE (212) 805-0047 and ELECTRONIC CASE FILING

United States Probation Officer Thomas McCarthy
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States of America v. Saadi Ahmad
07 Cr. 324-01 (GEL)

Dear U.S.P.O. McCarthy:

The defense is in receipt of the Pre-Sentence Investigation Report (PSR) prepared by you with respect to the above-referenced matter. I have reviewed the PSR with Mr. Ahmad and the following contains the defense's objections:

1. In the Identifying Data section, the number of dependents should be corrected to include Mr. Ahmad's wife, Quamar. Mrs. Ahmad does not work outside their home and had been financially supported by Mr. Ahmad until his arrest in the instant matter. However, at the present time, Mr. Ahmad is not working and he and his wife are being supported by their grown children.

2. In Paragraph 19, although Mr. Ahmad was present at the meet with Mr. Ul Haq, the confidential information (CI), and the undercover agent (UC-1), Mr. Ahmad denies that he was ever a co-owner or employee of Coseyco USA or held himself out to be the same or someone who was "handling sales" for Coseyco USA. Instead, Mr. Ahmad was an independent wholesaler of clothing to small stores in New York City. He received a very small percentage of the total amount of clothing that Mr. Ul Haq imported into the United States and then resold that clothing to his own customers. It must be noted that Mr. Ahmad was never an employee of, nor was a business partner of Mr. Ul Haq nor was he ever engaged in the business of importing clothing into the United States.

3. In Paragraph 26, with respect to Mr. Ul Haq's conversation with UC-1 in which Mr. Ul Haq indicated that UC-1 could collect future payments from Mr. Shujaatullah or from Mr. Ahmad, the defense requests that an additional sentence or paragraph be added to include the fact that Mr. Ahmad was not present at the time of this conversation and that Mr. Ahmad never collected nor distributed any monies on behalf of Mr. Ul Haq or Coseyco USA.

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4. In Paragraph 50, the defense requests an additional sentence or paragraph reflecting that UC-1 approached Mr. Ahmad regarding his continued interest in introducing UC-1 to other individuals, rather than Mr. Ahmad actively seeking out UC-1. In addition, with respect to the \$3,000.00 per container commission Mr. Ahmad was to receive, the defense submits that this sum was offered by UC-1, rather than demanded by Mr. Ahmad. Furthermore, the defense requests that the fact that no commissions were ever paid to, or received by, Mr. Ahmad also be included in the PSR. Finally, it is submitted that Mr. Ahmad's role in the conspiracy to bribe public officials was limited to introducing the UC-1 to Mr. Ul Haq and CC-1/CC-2.

5. In Paragraph 55, the report should reflect that at the time of the PSR interview, Mr. Ahmad indicated that he maintained his guilty plea and the facts of his allocution which he made before Magistrate Judge Maas.

6. In Paragraph 72, the report should be amended to reflect that Mr. Shamim Ahmad is not a physician but has a PhD. in engineering.

7. In Paragraph 76, the report should be amended to reflect that Mohammad Ahmad is a computer engineer rather than a computer technician.

8. In Paragraph 86, the report should be amended to state that from 2004 to 2006, Mr. Ahmad was self-employed purchasing wholesale clothing from Mr. Ul-Haq.

Thank you for your consideration of these objections. If you wish to discuss this matter further, please do not hesitate to call me.

Very truly yours,

G. J. Lesser

Gary J. Lesser

c: Saadi Ahmad (via first class mail)
Hon. Gerard E. Lynch (via ECF only)
A.U.S.A. Harry Chernoff (via facsimile and ECF)